

AP - 012

# APPROVALS

YEAR(S):

2005-2000



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**BILL RICHARDSON**  
Governor  
**Joanna Prukop**  
Cabinet Secretary

**Mark E. Fesmire, P.E.**  
Director  
Oil Conservation Division

June 2, 2005

Ms. Camille Reynolds  
Plains Marketing, L.P.  
3514 Lovington Hwy.  
Hobbs, NM 88240

Re: Plains All American Site Restoration Work Plan  
And Proposed Soil Closure Strategy dated December 2004  
TNM 98-05A Release Site, NMOCD Ref. AP-12  
Section 26, Township 21 South, Range 37 East  
Lea County, New Mexico

Dear Ms. Reynolds:

The New Mexico Oil Conservation Division (NMOCD) has received and reviewed the plan shown above. This work plan is hereby approved with the following conditions and understandings:

1. Additional soil will be removed from the east wall of the current excavation. This process will continue until that area of the excavation exhibits TPH and BTEX concentrations below regulatory guidelines for the site, which has a ranking score of 40.
2. When regulatory limits are attained for the excavation, Plains will install a geosynthetic clay liner with specifications shown in the referenced work plan (Appendix B).
3. Plains will backfill the excavation with the stockpiled excavated soil.
4. Plains will grade the site to original contours and the area will be re-vegetated.
5. At the completion of the work described in 1 - 4 above, Plains will submit a final Soil Closure Report documenting the results of confirmation soil samples, installation of the clay liner (with photographs) and final surface restoration.
6. Should the report described in #5 above meet with the satisfaction of the NMOCD, Plains will be allowed to close the soil portion of the project.
7. Groundwater remediation activities at the site will continue until such time that the site meets the NMOCD groundwater standards.
8. Plains will take steps to recover the phase-separated hydrocarbons in MW-1, MW-2 and MW-10 as reported in the 2004 Monitoring Report, dated April 2005. Any other monitor wells in which PSH is discovered will be added to this recovery operation.
9. Groundwater monitoring will continue at this site until remediation levels have been achieved.

Plains All American Remediation Site #98-05A

NMOCD Ref. AP-12

June 2, 2005

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If you have any questions, contact me at (505) 476-3492 or [emartin@state.nm.us](mailto:emartin@state.nm.us)

NEW MEXICO OIL CONSERVATION DIVISION



Edwin E. Martin  
Environmental Bureau

cc: NMOCD, Hobbs



# NEW MEXICO ENERGY, MINERALS and NATURAL RESOURCES DEPARTMENT

**GARY E. JOHNSON**  
Governor  
**Jennifer A. Salisbury**  
Cabinet Secretary

**Lori Wrotenbery**  
Director  
**Oil Conservation Division**

December 7, 2000

**CERTIFIED MAIL**  
**RETURN RECEIPT NO: 5051-3921**

Mr. Glenn Waldrop  
EOTT Energy Pipeline Limited Partnership  
P.O. Box 1660  
Midland, Texas 79702

**RE: STAGE 2 GROUND WATER ABATEMENT PLAN (AP-12)  
TNM-98-5A SITE**

Dear Mr. Waldrop:

The New Mexico Oil Conservation Division (OCD) has completed a review of the following EOTT Energy Pipeline Limited Partnership (EOTT) documents:

- October 4, 2000 "NOTICE OF PUBLICATION, GROUND WATER ABATEMENT PLAN (AP-12), TNM-98-05A SITE, LEA COUNTY, NEW MEXICO".
- June 27, 2000 "PETROLEUM RELEASE SITE TNM 98-05A, NE1/4 NW1/4 SECTION 26, TOWNSHIP 21 SOUTH, RANGE 37 EAST, LEA COUNTY, ADDITIONAL INFORMATION REQUESTED FOR STAGE 1 ABATEMENT PLAN".
- January 5, 2000 "STAGE 1 GROUND WATER ABATEMENT PLAN (AP-12), TNM-98-5A SITE".

These documents contain the results of EOTT's Stage 1 Investigations, a Stage 2 Abatement Plan and proof of public notification for ground water contamination resulting from a crude oil pipeline spill at the TNM-98-5A site.

The OCD has not received any response to the public notification of the Stage 1 Investigations and the Stage 2 Abatement Plan Proposal. The above referenced Stage 2 Abatement Plan Proposal **is approved** with the following conditions:

1. In addition to the proposed quarterly benzene, toluene, ethylbenzene and xylene

sampling, on an annual basis EOTT shall sample and analyze ground water from all monitor wells for concentrations of polynuclear aromatic hydrocarbons (PAH) and New Mexico Water Quality Control Commission (WQCC) metals.

2. All soil and ground water samples shall be obtained and analyzed using EPA approved methods and quality assurance/quality control (QA/QC).
3. All wastes generated will be disposed of at an OCD approved facility.
4. EOTT shall submit an annual report on all monitoring and remediation activities to the OCD by January 1 of each year. The report shall be submitted to the OCD Santa Fe Office with a copy provided to the OCD Hobbs District Office. The report shall contain the following information:
  - a. A description of all remediation and monitoring activities which occurred during the past calendar year including conclusions and recommendations.
  - b. A quarterly water table map showing the location of the spill, pipeline, monitor wells and other pertinent site features as well as the direction and magnitude of the hydraulic gradient.
  - c. Summary tables of all past and present ground water quality sampling results and copies of all recent laboratory analytical data sheets and associated QA/QC data.
  - d. Summary tables of the quarterly free product thickness in each monitor well, the quarterly volume of free product recovered and the cumulative volume of free product recovered to date.
  - e. The results of all soil remediation and monitoring activities including copies of all recent laboratory analytical data sheets and associated QA/QC data.
  - f. Isopleth maps for contaminants of concern at the site.
  - g. The disposition of all wastes generated.
5. EOTT shall notify the OCD at least 48 hours in advance of all scheduled activities such that the OCD has the opportunity to witness the events and split samples.

Please be advised that OCD approval does not limit EOTT to the proposed work plan should the plan fail to remediate or monitor contamination related to EOTT's pipeline, or if contamination exists which is outside the scope of the work plan. In addition, OCD approval does not relieve EOTT of responsibility for compliance with any other federal, state or local laws and regulations.

If you have any questions or comments, please contact Bill Olson of my staff at (505) 827-7154.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger C. Anderson". The signature is fluid and cursive, with a large initial "R" and "A".

Roger C. Anderson  
Environmental Bureau Chief

xc: Chris Williams, OCD Hobbs District Office  
Jesse Taylor, Environmental Technology Group, Inc.